

# **EXHIBIT A**

**Maria L. Nixon**

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**From:** Patrick Stockalper  
**Sent:** Wednesday, February 21, 2024 4:39 PM  
**To:** Thomas Ferlauto  
**Cc:** Molshree Gupta; Arlene King; Philip Cohen; Barbara Ezra; Maria L. Nixon  
**Subject:** RE: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

Tom:

We have been advised by County Counsel that LASD Risk Management anticipates having their internal required documentation completed in March. It then will need to be sent out for signatures, then placed on the Contract Cities Claims Board Agenda for approval (their Board meets once a month – second Wednesday of the month). Once the Contract Cities Claims Board approves, the settlement will need to be placed on the Board of Supervisors Agenda for their final approval.

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**From:** Thomas Ferlauto <tmf@lawofficetmf.com>  
**Sent:** Wednesday, February 21, 2024 10:57 AM  
**To:** Patrick Stockalper <pstockalper@kmslegal.com>  
**Cc:** Molshree Gupta <mgupta@kmslegal.com>; Arlene King <aking@kmslegal.com>; Philip Cohen <pcohen@pcohenlaw.com>; Barbara Ezra <bezra@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>  
**Subject:** Re: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

Can I get the courtesy of a response please?

---

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THOMAS M. FERLAUTO  
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On Feb 14, 2024, at 9:08 AM, Thomas Ferlauto <[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)> wrote:

Counsel:

It has now been six months, and more than 180 days, since the fully executed settlement agreement was delivered to defendants.

Can we please be provided with an update on the efforts to complete this settlement and when Plaintiff can expect performance?

Thank you,

Thomas M. Ferlauto

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On Dec 20, 2023, at 9:57 AM, Patrick Stockalper <[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)> wrote:

Agreed

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---

**From:** Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)>  
**Sent:** Wednesday, December 20, 2023 9:56:54 AM  
**To:** Thomas Ferlauto <[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)>  
**Cc:** Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)>; Philip Cohen <[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>; Patrick Stockalper <[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>; Barbara Ezra <[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>; Maria L. Nixon <[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>  
**Subject:** RE: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

Any assertion that the County is "sitting" on the settlement is speculative (and not true at all). There is a consuming and comprehensive corrective action and internal review process, which is ongoing.

<image001.jpg>

Molshree Gupta  
Partner  
**KJAR, McKENNA & STOCKALPER, LLP**

---

**From:** Thomas Ferlauto <[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)>  
**Sent:** Wednesday, December 20, 2023 9:45 AM  
**To:** Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)>

**Cc:** Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)>; Philip Cohen <[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>;  
Patrick Stockalper <[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>; Barbara Ezra <[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>;  
Maria L. Nixon <[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>  
**Subject:** Re: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

What has been done and when was it done?

That provision was not carte blanche to sit on the settlement for five months, which is what appears happened.

Thank you,

Tom

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On Dec 20, 2023, at 9:41 AM, Molshree Gupta  
<[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)> wrote:

Good morning, Counsel:

As contemplated by the Settlement Agreement ("In order to comply with the Brown Act, it is understood and anticipated that this process will take a minimum of 180 days from the date that the executed copy of this release is provided to the County by the Plaintiff"), we anticipate this will be wrapped up by March/April 2024.

We are still only 130 days past execution, well away from the minimum 180 days contemplated by the Agreement.

Your patience and professionalism moving forward are appreciated.

Thanks,

<image001.jpg>

Molshree Gupta

Partner  
**KJAR, McKENNA & STOCKALPER, LLP**

---

**From:** Thomas Ferlauto <[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)>  
**Sent:** Wednesday, December 20, 2023 9:20 AM  
**To:** Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)>  
**Cc:** Philip Cohen <[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>; Patrick Stockalper <[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>; Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)>; Barbara Ezra <[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>; Maria L. Nixon <[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>  
**Subject:** Re: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

WTF does that mean? 2024? 2025?

What exactly has been done over the past 5 months?

Any intentional delay would be a breach of the settlement.

Sincerely,

Tom

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On Dec 20, 2023, at 9:12 AM, Arlene King  
<[aking@kmslegal.com](mailto:aking@kmslegal.com)> wrote:

Hi Mr. Ferlauto:

We have been advised that the LASD continues to work on its internal review procedures which need to be completed before the matter can undergo further County review/approval for scheduling with the Claims Board, and then the Board of Supervisors.

We will be sure to forward any updates received from the County.

Thank you.

Arlene

---

**From:** Thomas Ferlauto <[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)>  
**Sent:** Friday, December 8, 2023 4:40 PM  
**To:** Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)>  
**Cc:** Philip Cohen <[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>; Patrick Stockalper <[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>; Molshree Gupta <[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)>; Barbara Ezra <[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>; Maria L. Nixon <[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>  
**Subject:** Re: (610-2) Assif, Joshua v. County of Los Angeles / Request for W-9s

Just following up again.

Any update as to when we can expect the settlement to be fulfilled?

Thanks,

Tom

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On Nov 13, 2023, at 11:17 AM, Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)> wrote:

Hi Mr. Ferlauto:

We are checking and will let you know  
when we receive an update.

Thank you.

Arlene

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**From:** Thomas Ferlauto  
<[tmf@lawofficetmf.com](mailto:tmf@lawofficetmf.com)>  
**Sent:** Monday, November 13, 2023  
10:22 AM  
**To:** Arlene King <[aking@kmslegal.com](mailto:aking@kmslegal.com)>  
**Cc:** Philip Cohen  
<[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>; Patrick  
Stockalper  
<[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>;  
Molshree Gupta  
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<[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>; Maria L. Nixon  
<[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>  
**Subject:** Re: (610-2) Assif, Joshua v.  
County of Los Angeles / Request for W-  
9s

Following up again. Please let us know  
where we are on this settlement. Any  
estimate as to when the check will be  
processed?

Thanks,

Tom

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On Oct 27, 2023, at  
11:05 AM, Thomas  
Ferlauto  
<[tmf@lawofficetmf.co](mailto:tmf@lawofficetmf.com)  
[m](mailto:tmf@lawofficetmf.com)> wrote:

Arlene:

You should have Mr.  
Cohen's W-9 by  
now. Let me know if  
you need anything  
else. Also, please  
provide us with an  
updated estimate as to  
when the check will be  
processed.

Thank you,

Tom

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On Oct  
23,  
2023,  
at 2:48  
PM,  
Arlene  
King  
<[aking@kmsle.com](mailto:aking@kmsle.com)>  
>

wrote:

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Arlene

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**From:** A  
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**Sent:** T  
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8:47  
AM

**To:** Thomas  
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o

<[tmf@lawoffice.tmf.com](mailto:tmf@lawoffice.tmf.com)>

**Cc:** Philip  
Cohen

<[pcohen@pcohenlaw.com](mailto:pcohen@pcohenlaw.com)>;

Patrick  
Stockalper

<[pstockalper@kmslegal.com](mailto:pstockalper@kmslegal.com)>

;

Molshree  
Gupta

<[mgupta@kmslegal.com](mailto:mgupta@kmslegal.com)>;

Barbara  
Ezra

<[bezra@kmslegal.com](mailto:bezra@kmslegal.com)>

>;

Maria  
L. Nixon

<[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>

**Subject**

: RE:

(610-2)

Assif,  
Joshua  
v.

County  
of Los  
Angeles  
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Thanks.

Arlene

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**From:** T  
homas  
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o  
<[tmf@awofficeetmf.com](mailto:tmf@awofficeetmf.com)>

**Sent:** T  
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**To:** Arle

ne King

<[aking@kmslegal.com](mailto:aking@kmslegal.com)>

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<[pcohenlaw.com](mailto:pcohenlaw.com)>;

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Barbara

Ezra

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>;

Maria

L. Nixon

<[mnixon@kmslegal.com](mailto:mnixon@kmslegal.com)>

**Subject**

: Re:

(610-2)

Assif,

Joshua

v.

County

of Los

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